

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FULTON COUNTY EMPLOYEES' RETIREMENT
SYSTEM, Derivatively on Behalf of
THE GOLDMAN SACHS GROUP, INC.,

Plaintiff,

v.

LLOYD BLANKFEIN, DAVID M. SOLOMON, M.
MICHELE BURNS, MARK A. FLAHERTY,
WILLIAM W. GEORGE, JAMES A. JOHNSON,
ELLEN J. KULLMAN, LAKSHMI N. MITTAL,
ADEBAYO O. OGUNLESI, PETER OPPENHEIMER,
DAVID A. VINIAR, and MARK O. WINKELMAN,

Defendants,

and

THE GOLDMAN SACHS GROUP, INC.,

Nominal Defendant.

**NOTICE OF PLAINTIFF'S UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT**

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law in Support of Plaintiff's Unopposed Motion for Preliminary Approval of Settlement, the Stipulation and Agreement of Settlement, and all prior proceedings in this action, Plaintiff Fulton County Employees' Retirement System, by and through its undersigned counsel, hereby respectfully moves this Court, before the Honorable Vernon S. Broderick, United States District Judge, United States District Court for the Southern District of New York, Thurgood Marshall, United States Courthouse, 40 Foley Square, New York, New York 10007, for an order: (i) granting preliminary approval of the Proposed Settlement; (ii) approving the form and manner of the Parties' proposed

Case No. 1:19-cv-1562 (VSB)

Notice and Summary Notice; and (iii) scheduling a final Settlement Hearing.

For the Court's convenience, the Parties' agreed-upon form of proposed Preliminary Approval Order is submitted herewith.

Dated: May 13, 2022

Respectfully submitted,

SAXENA WHITE P.A.

/s/ Steven B. Singer

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Counsel for Plaintiff Fulton County Employees' Retirement System

CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2022, I caused to be filed a true and correct copy of the foregoing with the Clerk of Court via CM/ECF. Notice of this filing will be sent electronically to all registered parties by operation of the Court's electronic filing system.

/s/ Steven B. Singer
Steven B. Singer